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By ECF

Hon. John G. Koeltl
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United States Courthouse
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January 4, 2024

Re: *Kingdom of Belgium, Federal Public Service Finance Pension Plan Litigation*,
Lead Case: No. 21 Civ. 6392 (JGK)
Member Cases: Nos. 21 Civ. 6392 (JGK), 21 Civ. 6399 (JGK), 21 Civ. 6402 (JGK),
21 Civ. 6404 (JGK), 21 Civ. 6405 (JGK), 21 Civ. 6407 (JGK),
21 Civ. 6408 (JGK)

Dear Judge Koeltl:

We write pursuant to Section 1.E of Your Honor’s Individual Practices, and with the consent of all parties, to request extensions of various deadlines set forth in the Rule 26(f) Report approved by the Court on August 7, 2023 Order (the “August 7 Order”).

In the August 7 Order, the Court approved an initial expedited discovery schedule relating to the statute of limitations defense. Under the current schedule, the “Statute of Limitations Discovery Cut-Off” is January 10, 2024. Although Plaintiff has been working to meet this deadline, it has become clear that more time will be needed to complete the collection and review of documents in Belgium. Plaintiff approached Defendants about extending this deadline in late December, and this led the parties to reconsider other deadlines in the August 7 Order.

The parties have now agreed to the following revised schedule, which generally extends all deadlines in the August 7 Order by 60 to 90 days:

Description	Proposed Deadline
Begin Rolling Production of Remaining Documents (by Parties)	February 9, 2024
Statute of Limitations Discovery Cut-Off	March 11, 2024

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Description	Proposed Deadline
Limited Rule 30(b)(6) Deposition of Plaintiff (Statute of Limitations Issues Only)	April 15, 2024
Limited Consolidated Summary Judgment Motion on Statute of Limitations Issues	May 14, 2024
Completion of General Document Production (by Parties)	June 10, 2024
Contention Interrogatories pursuant to Local Civil Rule 33.3 may be served	July 9, 2024
Meet-and-confer on Topics for Expert Discovery	October 25, 2024
Fact Discovery Cut-Off	November 25, 2024
Expert Reports by Party with Burden	January 23, 2025
Rebuttal Expert Reports	February 24, 2025
Expert Discovery Cut-Off	April 16, 2025
Dispositive Motions	May 16, 2025
Pretrial Order	45 days from date of decision on any dispositive motion (or May 28, 2025, if there is no such motion)

In addition, Plaintiff has agreed to identify its Rule 30(b)(6) deposition witness and to propose dates for the deposition consistent with the revised schedule by January 31, 2024.

The parties jointly request that the Court approve these modifications to the schedule. This is the first request for extensions of the deadlines in the August 7 Order.

Respectfully submitted,

s/ Jeff E. Butler

Jeff E. Butler